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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

TIMOTHY RYAN GOVE,

Plaintiff,

v.

SARGENTO FOODS INC.,

Defendant

Case No. 18-CV-1335

Honorable Judge Pamela Pepper

CLERK USDC EDWI
FILED
2022 AUG 10 P 12:46

MOTION TO PERMIT SARGENTO FOODS INC MANAGEMENT TO BE DEPOSITION OF WRITTEN
QUESTIONS

August 8, 2022

Your honor,

I am seeking approval to subpoena a written deposition to Sargento management personnel of human resources and supervisors with written questions regarding issues of employment there. They are; human resources management personnel, Maria Herrera, Laura Beihn, Jeffery Kieser, and Sonja Otte, and supervisor's Eric Driessen, and Jeff Miller.

Due to the discrepancies in what Sargento has supplied me in my records requests of my personal employment records, I need a in-depth inquiry in events curtailing up to my termination. The purpose of these question's are to inquire into the investigative procedures and events listed in the second amended complaint and events which occurred at Sargento facilities and outside of them. It will provide me with valued information on what to expect at the trial. I demand them to be completed and returned to me within two weeks of 08-08-22 or by the end of the day of 08-22-22.

The reason I am filing this motion with the court is two reasons; there are many discrepancies in what was submitted to me from Sargento, and due to stall technique Dill and McCann has displayed in the past. They will object to these depositions and delay the process as long as they

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can; but, when the rejection time has expired, I expect these questions to be filled out and returned to me promptly.

So there will be no delaying into what questions I am seeking, I am listing them for your viewing in advance. Questions numbers 1 thru 33 are all the same for all; with exception of supervisor Jeff Miller, his are identical to line 32, additional questions are custom made for each individual afterwards.

Exhibit A is HR Maria Herrera

Exhibit B is HR Laura Beihn

Exhibit C is HR Jeff Kieser

Exhibit D is HR Sonja Otte

Exhibit E is Supervisor Eric Driessen

Exhibit F is Supervisor Jeff Miller

Bless,

A handwritten signature in black ink that reads "Timothy R Gove". The script is cursive and fluid, with the first name "Timothy" being more prominent than the last name "Gove".

TIMOTHY RYAN GOVE

PRO SE

Exhibit A HR Maria Herrera

These questions are for Sargento senior human resources management Maria Herrera. Purpose of these questions is to inquire into the investigative procedures and events listed in the second amended complaint and events which occurred at Sargento facilities and outside of them. It will provide me with valued information on what to expect at the trial. I demand them to be completed and returned to me within two weeks of 08-08-22 or by the end of the day of 08-22-22.

For all yes answers, explain in detail.

1. What is your full name?
2. Have you ever used any other names? Maiden names? Or nick names?
3. What is your date of birth? Where were you born?
4. What is your age?
5. What is your social security number or driver license?
6. What is your address where you reside?
7. What did you do to prepare for this written deposition?

8. Have you discussed this lawsuit with anyone else, signed any statements or affidavits relating to this lawsuit, or posted information about this lawsuit on any internet site?
9. Was anyone else present when you discussed this case with your lawyer?
10. Have you ever met any other witness of party to this case prior to the events giving rise to the lawsuit?
11. Have you ever been deposed or testified in court before?
12. Have your read any witness statements or seen any other evidence prior to this deposition?
13. Besides for the current case, have you ever been involved in a lawsuit?
14. Are you an advocate for the defendant?
15. Your job is to protect the company, correct?
16. At the trial will you try to persuade the jury?
17. Are some lies permissible in your own personal code of conduct?

18. Are you aware that you are under oath and that your responses will in essence become part

of your permanent record and can be brought up in all future cases that you testify in?

19. Would you like your side to win the case?

20. Have you ever lied?

21. You testify for the party that pays you, correct?

22. Do you investigate complaints and accusations of incidences of behaviors of harassment,

discriminations, bullying, or devious behavior acts of employees?

23. Please describe offensive or inappropriate behavior which you have witnessed at Sargento

facilities?

24. Has anything happened lately to disrupt the Hilbert plants harmony in which you are aware

of?

25. What is the procedure for handling complaints?

26. Are you qualified to writing up and addressing complaints?

27. What do you do for the company?

28. What is your job title?

29. Who is your supervisor?

30. Have you ever taken a complaint and directed it to another person?

31. Have you ever taken a complaint and not received a response from higher management?

32. Do you communicate with human resource management, supervisors, and upper
management via email?

33. How many complaints have you received about Timothy Gove? How did you handle them?

34. Did you have discussions with other management and/or peers regarding them?

35. Did you ever receive harassment complaints against Timothy Gove?

36. Did you ever reprimand someone for lying in a complaint or accusation?

37. Have you ever participated in harassment or retaliation against a person who filed a complaint, discussed inappropriate behaviors of peers or was involved in an investigation?
38. Were you ever a participant in the preparation in terminating any employee?
39. Do you recall Timothy Gove complaining about Katie Clauson harassing him? What was your solution?
40. Who were the women Timothy Gove discussed with you about constant unwanted sexual conversations?
41. Did you ask Katie Clauson if she was upset that she couldn't seduce an older man?
42. Why didn't you tell Timothy Gove what the nature of the complaint regarding Katie Clauson was about?
43. In the interview regarding Katie Clauson's complaint; why wasn't there any paperwork to sign or fill out?

44. Did you ever revile confidential information to hourly employees about conversations with

Timothy Gove?

45. Did Jeff Kieser inform you of the vehicle threats of Timothy Gove vehicle by Katie Clauson

and Amy Fucile?

46. Did Jeff Kieser inform you of the parking lot stunt by Katie Clauson?

47. In April of 2017, why was Katie Clauson sent to another plant, which plant, and what shift?

48. Did you offer Katie Clauson a first shift job at the Hilbert north plant between 2017 and

2018?

49. What Hilbert plant building, and what shift does Katie Clauson currently work? How long

has she been at that building and shift?

50. Name all of the individuals interviewed in the Katie Clauson harassment accusations?

51. Who investigated the blowjob stunt by Katie Clauson, Timothy Gove reported to you, and

who did they interview?

52. How many Katie Clauson blowjob stunts were you aware of?

53. What other harassments, discriminations or threats of Timothy Gove were you aware of

during 2017 and 2018?

54. What is the purpose of the fitness for duty examination, evaluation or consulting

requirement?

55. What is the proper definition of the fitness for duty examination?

56. How many people have you been involved in, which was required to participate in a fitness

for duty evaluation besides Timothy Gove?

57. What is the purpose of the fitness for duty evaluation?

58. Do you recall me telling you in the meeting requiring me to participate in the fitness for

duty evaluation, ' the truth never stays buried!'

59. Have you ever ignored telephone messages from any hourly employees?

60. How many people have you been involved in terminations?

61. How long have you been working at Sargento Foods Inc.?

62. How many discussions were you part of in which Timothy Gove's name was mentioned?

63. How many accusations or complaints were investigated of Timothy Gove under your

supervision?

64. Who authorized the summer month's employment of high school girls/young women to

work at the Hilbert North plant in 2017?

65. Who screened the selected the young women to work during the summer months?

66. What were the requirements to question 65?

67. What was the objective of these employment activities of question 65?

Exhibit B **HR Laura Beihn**

These questions are for Sargento senior human resources management Laura Beihn. Purpose of these question's are to inquire into the investigative procedures and events listed in the second amended complaint and events which occurred at Sargento facilities and outside of them. It will provide me with valued information on what to expect at the trial. I demand them to be completed and returned to me within two weeks of 08-08-22 or by the end of the day of 08-22-22.

For all yes answers, explain in detail.

1. What is your full name?
2. Have you ever used any other names? Maiden names? Or nick names?
3. What is your date of birth? Where were you born?
4. What is your age?
5. What is your social security number or drivers license?
6. What is your address where you reside?
7. What did you do to prepare for this written deposition?

8. Have you discussed this lawsuit with anyone else, signed any statements or affidavits

relating to this lawsuit, or posted information about this lawsuit on any internet site?

9. Was anyone else present when you discussed this case with your lawyer?

10. Have you ever met any other witness of party to this case prior to the events giving rise to

the lawsuit?

11. Have you ever been deposed or testified in court before?

12. Have you read any witness statements or seen any other evidence prior to this deposition?

13. Besides for the current case, have you ever been involved in a lawsuit?

14. Are you an advocate for the defendant?

15. Your job is to protect the company, correct?

16. At the trial will you try to persuade the jury?

17. Are some lies permissible in your own personal code of conduct?

18. Are you aware that you are under oath and that your responses will in essence become part

of your permanent record and can be brought up in all future cases that you testify in?

19. Would you like your side to win the case?

20. Have you ever lied?

21. You testify for the party that pays you, correct?

22. Do you investigate complaints and accusations of incidences of behaviors of harassment,

discriminations, bullying, or devious behavior acts of employees?

23. Please describe offensive or inappropriate behavior which you have witnessed at the

Sargento facilities?

24. Has anything happened lately to disrupt the Hilbert plants harmony in which you are aware

of?

25. What is the procedure for handling complaints?

26. Are you qualified to writing up and addressing complaints?

27. What do you do for the company?

28. What is your job title?

29. Who is your supervisor?

30. Have you ever taken a complaint and directed it to another person?

31. Have you ever taken a complaint and not received a response from higher management?

32. Do you communicate with human resource management, supervisors, and upper
management via email?

33. How many complaints have you received about Timothy Gove? How did you handle them?

34. Regarding the Aaron Beitler threatening comment, on what date did you or anyone else
interview William Roit and Aaron Beitler?

35. Name all the hourly employees you interviewed of the allegation of threats made to Timothy

Gove.

36. During our interview did I come across as threatening or upset?

37. How many times did you call me after my shift has ended?

38. Why didn't you just call me in to your office to discuss the issues?

39. List all the names of people you interviewed in the throwing of boxes of full products

incident. Did anyone else interview these people?

40. In the above incident, did you interview any people from line 325 or the fork lift drivers?

41. Why did you laugh when you suspended and later when you fired me? Do you believe it

was a laughing matter?

42. Isn't it a custom to give a person an exit interview?

43. Why wasn't I given the opportunity an exit interview?

Exhibit C HR Jeff Kieser

These questions are for Sargento human resources management Jeffery Kieser. The purpose of these question's are to inquire into the investigative procedures and events listed in the second amended complaint and events which occurred at Sargento facilities and outside of them. It will provide me with valued information on what to expect at the trial. I demand them to be completed and returned to me within two weeks of 08-08-22 or by the end of the day of 08-22-22.

For all yes answers, explain in detail.

1. What is your full name?
2. Have you ever used any other names? Or nick names?
3. What is your date of birth? Where were you born?
4. What is your age?
5. What is your social security number or driver license?
6. What is your address where you reside?
7. What did you do to prepare for this written deposition?

8. Have you discussed this lawsuit with anyone else, signed any statements or affidavits

relating to this lawsuit, or posted information about this lawsuit on any internet site?

9. Was anyone else present when you discussed this case with your lawyer?

10. Have you ever met any other witness of party to this case prior to the events giving rise to the lawsuit?

11. Have you ever been deposed or testified in court before?

12. Have you read any witness statements or seen any other evidence prior to this deposition?

13. Besides for the current case, have you ever been involved in a lawsuit?

14. Are you an advocate for the defendant?

15. Your job is to protect the company, correct?

16. At the trial will you try to persuade the jury?

17. Are some lies permissible in your own personal code of conduct?

18. Are you aware that you are under oath and that your responses will in essence become part of your permanent record and can be brought up in all future cases that you testify in?

19. Would you like your side to win the case?

20. Have you ever lied?

21. You testify for the party that pays you, correct?

22. Do you investigate complaints and accusations of incidences of behaviors of harassment, discriminations, bullying, or devious behavior acts of employees?

23. Please describe offensive or inappropriate behavior which you have witnessed at Sargento facilities?

24. Has anything happened lately to disrupt the Hilbert plants harmony in which you are aware of?

25. What is the procedure for handling complaints?

26. Are you qualified to writing up and addressing complaints?

27. What do you do for the company?

28. What is your job title?

29. Who is your supervisor?

30. Have you ever taken a complaint and directed it to another person?

31. Have you ever taken a complaint and not received a response from higher management?

32. Do you communicate with human resource management, supervisors, and upper
management via email?

33. How many complaints have you received about Timothy Gove? How did you handle them?

34. Did you have discussions safety violations with other management and/or peers regarding
them?

35. Did you ever receive harassment complaints against Timothy Gove?

36. How many complaints were brought to your attention by Timothy Gove?
37. How many complaints were brought to your attention regarding Katie Clauson, Bruce Behnke, Jeff Van Asten, Melissa Berg/Bratz, Bill Roit and Aaron Beitler? How many of those people were mentioned by Timothy Gove in conversations?
38. Did you ever reprimand someone for lying in a complaint or accusation?
39. Have you ever participated in harassment or retaliation against a person who filed a complaint, discussed inappropriate behaviors of hourly workers or was involved in an investigation?
40. Were you ever a participant in the preparation in terminating any employee?
41. In the 2018 five year anniversary banquet dinner, did you take Timothy Gove and Barbara Finnel dinner plate order.
42. Did Timothy Gove in conversation of the dinner plate selection specify purposely that his date adheres to a biblical diet, and does not eat pork?

43. Did any of the options of the menu include pork?

44. Was the individual choice of the dinner dish's switched as a harassment stunt due to the
current environment at work?

45. During conversations with Timothy Gove, on August 28, 2017, were the conversations
audio taped?

46. What was the result of the investigation into the Katie Clauson parking lot stunt? Who
investigated it?

47. Who investigated the intimidation stunt of threatening to damage my vehicle by Katie
Clauson and Amy Fucile?

48. Name some comments you made to Timothy Gove in regarding question 47?

49. Did I mention to you Katie Clauson re-inactivating me on messenger?

50. What was your response to Timothy Gove regarding question 49?

51. What was Timothy Gove comment about politics?

52. Why didn't you file the grievance complaint about the product box throwing event I

inquired about on March 16th, 2018 before my shift started?

53. In question 52, were you instructed not too?

Exhibit D HR Sonja Otte

These questions are for Sargento human resources management Sonja Otte. The purpose of these question's are to inquire into the investigative procedures and events listed in the second amended complaint and events which occurred at Sargento facilities and outside of them. It will provide me with valued information on what to expect at the trial. I demand them to be completed and returned to me within two weeks of 08-08-22 or by the end of the day of 08-22-22.

For all yes answers, explain in detail.

1. What is your full name?
2. Have you ever used any other names? Maiden names? Or nick names?
3. What is your date of birth? Where were you born?
4. What is your age?
5. What is your social security number or driver license number?
6. What is your address where you reside?
7. What did you do to prepare for this written deposition?

8. Have you discussed this lawsuit with anyone else, signed any statements or affidavits

relating to this lawsuit, or posted information about this lawsuit on any internet site?

9. Was anyone else present when you discussed this case with your lawyer?

10. Have you ever met any other witness of party to this case prior to the events giving rise to the lawsuit?

11. Have you ever been deposed or testified in court before?

12. Have you read any witness statements or seen any other evidence prior to this deposition?

13. Besides for the current case, have you ever been involved in a lawsuit?

14. Are you an advocate for the defendant?

15. Your job is to protect the company, correct?

16. At the trial will you try to persuade the jury?

17. Are some lies permissible in your own personal code of conduct?

18. Are you aware that you are under oath and that your responses will in essence become part

of your permanent record and can be brought up in all future cases that you testify in?

19. Would you like your side to win the case?

20. Have you ever lied?

21. You testify for the party that pays you, correct?

22. Do you investigate complaints and accusations of incidences of behaviors of harassment,

discriminations, bullying, or devious behavior acts of employees?

23. Please describe offensive or inappropriate behavior which you have witnessed at Sargento

facilities?

24. Has anything happened lately to disrupt the Hilbert plants harmony in which you are aware

of?

25. What is the procedure for handling complaints?

26. Are you qualified to writing up and addressing complaints?
27. What do you do for the company?
28. What is your job title?
29. Who is your supervisor?
30. Have you ever taken a complaint and directed it to another person?
31. Have you ever taken a complaint and not received a response from higher management?
32. Do you communicate with human resource management, supervisors, and upper
management via email?
33. How many complaints have you received about Timothy Gove? How did you handle them?
34. Did you have discussions with other management and/or peers regarding them?
35. Did you ever receive harassment complaints against Timothy Gove?
36. How many complaints were brought to your attention by Timothy Gove?

37. When was your last day as acting senior human resources manager at the Sargento Hilbert plant.

38. Name all written complaints or verbal complaints you received from me or peers which filed complaints against me from 2012 thru your last day as acting senior human resources manager at the Hilbert plant.

39. When I was suspended in June or July of 2012 for a safety violation, why was I still allowed to attend an information technology job interview in Plymouth, WI?

40. Does Sargento employee manual; listed under the rules section, forbid an employee from applying for a different position within 6 months of any suspension. Yes or no?

41. Who made the decision of not letting Joseph Skardga to transfer to work on line 251?

42. Did you intentionally not call my name for recognition at the five year anniversary dinner banquet?

Exhibit E Supervisor Eric Driessen

These questions are for Sargento management supervisor Eric Driessen. Purpose of these questions is to inquire into the events listed in the second amended complaint and events which occurred at Sargento facilities and outside of them. It will provide me with valued information on what to expect at the trial. I demand them to be completed and returned to me within two weeks of 08-05-22 or by the end of the day of 08-19-22.

For all yes answers, explain in detail.

1. What is your full name?
2. Have you ever used any other names? Nick names?
3. What is your date of birth? Where were you born?
4. What is your age?
5. What is your social security number or driver license?
6. Where is your address where you reside?
7. What did you do to prepare for this written deposition?
8. Have you discussed this lawsuit with anyone else, signed any statements or affidavits relating to this lawsuit, or posted information about this lawsuit on any internet site?
9. Was anyone else present when you discussed this case with your lawyer?

10. Have you ever met any other witness of party to this case prior to the events giving rise to the lawsuit?

11. Have you ever been deposed or testified in court before?

12. Have you read any witness statements or seen any other evidence prior to this deposition?

13. Besides for the current case, have you ever been involved in a lawsuit?

14. Are you an advocate for the defendant?

15. Part of your job description is to protect the company, correct?

16. At the trial will you try to persuade the jury?

17. Are some lies permissible in your own personal code of conduct?

18. Are you aware that you are under oath and that your responses will in essence become part of your permanent record and can be brought up in all future cases that you testify in?

19. Would you like your side to win the case?

20. Have you ever lied?

21. You testify for the party that pays you, correct?

22. Do you report all incidences of behaviors of harassment, discriminations, bullying, or
devious behavior acts of employees to human resources?

23. Please describe offensive or inappropriate behavior which you have witnessed at
Sargento facilities which you were aware of?

24. Has anything happened lately to disrupt the department's harmony?

25. What is the procedure for handling complaints?

26. Are you qualified to writing up and addressing complaints?

27. What do you do for the company?

28. What is your job title?

29. Who is your supervisor?

30. Have you ever taken a complaint and directed it to another person?

31. Have you ever taken a complaint and not received a response from higher management?
32. Do you communicate with human resources via email?
33. How many complaints have you received about Timothy Gove? How did you handle them?
34. Did you have discussions with other management or hourly workers regarding them?
35. Did you ever receive harassment complaints against Timothy Gove?
36. Did you ever reprimand someone for lying in a complaint or accusation?
37. Have you ever participated in harassment or retaliation against a person who filed a complaint, discussed inappropriate behaviors of peers or was involved in an investigation?
38. Were you ever a participant in the preparation in terminating any employee?
39. Do you recall Timothy Gove complaining about Katie Clauson harassing him? What was your solution?
40. Are you an ordained minister?

41. Are you married, what is her name? If not currently married, how long were you?
42. Are you still a member at Breakthrough Covenant Church, and how long?
43. If no to question 41, what congregation do you attend and how long?
44. Do you know Debra Seidl from Breakthrough Covenant Church, and how long?
45. Did you ask or pay expenses to Debra Seidl to gather information about Timothy Gove during 2017?
46. If you didn't, did someone else pay for Debra Seidl expenses to interview me in 2017?
47. Does your wife know Debra Seidl from Breakthrough Covenant Church, and how long?
48. Is Madison Driessen relationship to you? Is she your niece?
49. Did Madison Driessen ever babysit for your children?
50. Do you know who Taylor Chevalier is?
51. Did Taylor Chevalier ever babysit for your children? Was she ever at your house, list the approximate times and dates?

52. Did you ask or pay Taylor Chevalier to harass or sexually entice Timothy Gove at

Xperience Fitness of Menasha in October of 2017?

53. Did you write any letters of recommendations to any of the high school girls/young

women who worked in the summer months of 2017 at the Hilbert North plant?

54. If someone doesn't have their safety bonus sheets signed by the due date, what is the

amount of money they could not be entitled too? Use a percentage if applicable.

55. On March 26, 2018; I put my quarterly safety bonus sheets on is chair, and after 3 days

they were still not signed. How long would it have taken you to sign them?

56. Why weren't quarterly safety bonus sheets signed?

Exhibit F Supervisor Jeff Miller

These questions are for Sargento management supervisor Jeffery Miller. Purpose of these questions is to inquire into the events listed in the second amended complaint and events which occurred at Sargento facilities and outside of them. It will provide me with valued information on what to expect at the trial. I demand them to be completed and returned to me within two weeks of 08-08-22 or by the end of the day of 08-22-22.

For all yes answers, explain in detail.

1. What is your full name?
2. Have you ever used any other names? Nick names?
3. What is your date of birth? Where were you born?
4. What is your age?
5. What is your social security number or driver license?
6. Where is your address where you reside?
7. What did you do to prepare for this written deposition?
8. Have you discussed this lawsuit with anyone else, signed any statements or affidavits relating to this lawsuit, or posted information about this lawsuit on any internet site?
9. Was anyone else present when you discussed this case with your lawyer?

10. Have you ever met any other witness of party to this case prior to the events giving rise to the lawsuit?

11. Have you ever been deposed or testified in court before?

12. Have you read any witness statements or seen any other evidence prior to this deposition?

13. Besides for the current case, have you ever been involved in a lawsuit?

14. Are you an advocate for the defendant?

15. Part of your job description is to protect the company, correct?

16. At the trial will you try to persuade the jury?

17. Are some lies permissible in your own personal code of conduct?

18. Are you aware that you are under oath and that your responses will in essence become part of your permanent record and can be brought up in all future cases that you testify in?

19. Would you like your side to win the case?

20. Have you ever lied?

21. You testify for the party that pays you, correct?

22. Do you report all incidences of behaviors of harassment, discriminations, bullying, or
devious behavior acts of employees to human resources?

23. Please describe offensive or inappropriate behavior which you have witnessed at
Sargento facilities?

24. What is the procedure for handling complaints?

25. Are you qualified to writing up and addressing complaints?

26. What do you do for the company?

27. What is your job title?

28. Who is your supervisor?

29. Have you ever taken a complaint and directed it to another person?

30. Have you ever taken a complaint and not received a response from higher management?

31. Do you communicate with human resource management, supervisors, and upper management via email?

32. How many complaints have you received about Timothy Gove? How did you handle them?

33. Did you have discussions with other management or hourly employees regarding them?

34. Did you ever receive harassment complaints against Timothy Gove?

35. Did you ever reprimand someone for lying in a complaint or accusation?

36. Name some of the complaints you received against Timothy Gove?

37. Of the complaints in question 36, which ones were for safety violations?

38. In June 13, 2014; Did you receive a safety violation about Timothy Gove from maintenance technician Daniel Gurner and process technician Dawn Michael?

39. How many times did you receive safety violations about Timothy Gove from the hourly workers listed in question 38 and others?

40. Did your investigations into the question 36 prove certain hourly workers were lying?

41. Did you ever discipline someone for lying and trying to get someone in trouble?

42. What is your opinion of Timothy Gove as a worker?